

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

UNITED STATES OF AMERICA, :  
 :  
Plaintiff, : CASE NO. 2:19-CR-202  
 :  
v. : JUDGE WATSON  
 :  
THOMAS ROMANO, :  
 :  
Defendant. :

**MOTION FOR CONTINUANCE**

Defendant, through undersigned counsel, respectfully moves the Court for an Order continuing the pretrial and trial currently set in the instant case. The reasons in support of this Motion are set forth in the following Memorandum.

Respectfully submitted,

**/s/ Samuel H. Shamansky**  
**SAMUEL H. SHAMANSKY CO., L.P.A.**

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Counsel for Defendant

**MEMORANDUM**

This matter is currently set for a final pretrial conference at 10:00 a.m. on October 28, 2020, and trial on November 2, 2020, at 9:00 a.m. Due to the health issues raised during the parties' telephone conference with the Court, Defendant requests that the final pretrial conference and trial be continued to later dates and times convenient to the Court. Moreover, Counsel for Defendant has discussed this request with Assistant U.S. Attorney Chris Jason, who indicates that the United States is not opposed to a continuance.

Accordingly, based on the foregoing, Defendant respectfully requests that the final pretrial and trial be continued to later dates and times convenient to the Court.

Counsel for Defendant submits that this Motion is not made for the purpose of needlessly delaying the resolution of this matter.

Respectfully submitted,

**/s/ Samuel H. Shamansky**  
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Counsel for Defendant

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true copy of the foregoing Motion for Continuance was filed with the Clerk of Court for the United States District Court for the Southern District of Ohio using the CM/ECF system, which will send notification of such filing to Chris Jason, Assistant

United States Attorney, 303 Marconi Boulevard, 2nd Floor, Columbus, Ohio 43215, on October 23, 2020.

**/s/ Samuel H. Shamansky**  
SAMUEL H. SHAMANSKY